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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN JOSE DIVISION**

11
12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 RAGINI VECHAM, et al.,
16 Defendants.

17 Case No.: CR 15-0427 BLF

18 **JOINT STIPULATION AND [PROPOSED] ORDER**
19 **RE STATUS CONFERENCE**

20 The United States, through its counsel Assistant United States Attorney Timothy J.
21 Lucey, and defendant Ragini Vecham, through her counsel Nanci Clarence and Josh Cohen,
22 defendant Kishore Pallapothu through his counsel Mary McNamara and Edwin Prather,
23 defendant Tota through his counsel Ethan Atticus Balogh and defendant Ramana Reddy
24 through his counsel Izzy Ramsey, hereby agree and stipulate to a continuance in this case
25 from Tuesday, December 8, 2015 to Tuesday, January 26, 2016, at 9:00 a.m. before this
Court.

This continuance is requested for the following:

The government provided a substantial amount of evidence to defense counsel consisting of almost one terabyte of electronic information. The parties are continuing to discuss additional items of discovery. Additional time is needed for the defense to review and evaluate the discovery provided, consider additional investigation and discovery requests, and make informed decisions regarding case strategy.

For these reasons, the parties respectfully request that the Court continue the status conference in this case from December 8, 2015 to January 26, 2016, at 9:00 a.m. The parties stipulate that the time period from December 8, 2015 through January 26, 2016 should be excluded under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv) in the interest of justice to permit effective defense investigation and preparation, and specifically to allow time for the defense to evaluate the discovery provided, consider additional investigation and discovery requests, and make an informed decision regarding the course of the case.

SO STIPULATED.

BRIAN J. STRETCH
Acting United States Attorney

Dated: December 2, 2015

/s/
TIMOTHY LUCEY
Assistant United States Attorney

Dated: December 2, 2015

_____/s/_____
NANCI CLARENCE
JOSH COHEN
Attorneys for Defendant
RAGINI VECHAM

1
2 Dated: December 2, 2015

3 _____/s/
4 MARY McNAMARA
5 EDWIN PRATHER
6 Attorneys for Defendant
7 KISHORE PALLAPOTHU

8
9 Dated: December 2, 2015

10 _____/s/
11 ETHAN A. BALOGH
12 Attorney for Defendant
13 SATYANARAYANA TOTA

14 Dated: December 2, 2015

15 _____/s/
16 IZZY RAMSEY
17 Attorney for Defendant
18 RAMANA REDDY

19
20 [PROPOSED] ORDER

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22 GOOD CAUSE APPEARING and per the parties' stipulation, IT IS HEREBY ORDERED
23 that a continuance in this case is granted from December 8, 2015 to January 26, 2016, at 9:00
24 a.m. before this Court. The Court finds that the ends of justice that will be served by granting a
25 continuance outweigh the best interests of the public and the defendant in a speedy trial, and
that for the reasons stated in the stipulation, i.e., the need for additional time for effective
discovery provided, consider additional investigation and discovery requests, and make an
informed decision regarding the course of the case, an exclusion of time is appropriate.

Accordingly, IT IS HEREBY ORDERED that, for the reasons stated in the stipulation,
the time within which the trial of this matter must be commenced under the Speedy Trial Act is

1 EXCLUDED during the time period from December 8, 2015, through January 12, 2016,
2 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv), due to the need for additional
3 time to permit effective defense investigation and preparation for the above-stated reasons,
4 and in the interests of justice.

5 IT IS SO ORDERED.
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7 Dated: _____
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HONORABLE BETH L. FREEMAN
UNITED STATES DISTRICT JUDGE